



Writer's Direct Dial: 703.755.6730  
Facsimile Number: 703.755.6740  
Sheba.Chacko@bt.com

June 22, 2012

*Via Electronic Filing*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

*EX PARTE LETTER*

RE: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Secretary Dortch:

On June 20, 2012, Kimber Lee McMann, President of BT's Consumer Packaged Goods Division and head of BT's operations for the US and Canada, spoke with Commissioner Pai via telephone to discuss the pricing flexibility triggers and pending pricing flexibility petitions. Ms. McMann explained that the current system is broken and that excessive pricing and margins earned by ILECs on special access are creating a non-competitive environment in markets in which BT operates. She urged Commissioner Pai to vote to suspend the pricing flexibility triggers and deny pending petitions for pricing flexibility while the Commission develops a new pricing flexibility framework. She also stressed the importance of issuing a mandatory data request as soon as possible.

Sincerely,

Sheba Chacko  
Head, North American Regulation and Global Telecoms  
Policy, BT

cc: Nick Degani